

Attorney for Kimberly Allen

KIMBERLY ALLEN, Personal Representative)
of the ESTATE OF TODD ALLEN,)
Individually, on Behalf of the ESTATE OF)
TODD ALLEN, and on Behalf of the Minor)
Child PRESLEY GRACE ALLEN,)

Case No.: 3:04-CV-0131-JKS

Plaintiffs,

VS.

UNITED STATES OF AMERICA,

Defendants.

Plaintiff, Kimberly Allen, by and through counsel Ashburn & Mason, P.C., hereby moves this Court for an order extending the date to file motions in limine. Discovery in this case has been extended many times by the parties and was finally completed in September 2006. The trial date has not yet been set and a status hearing is scheduled for November 13, 2006. Therefore, plaintiff moves this Court to accept the Motion For Ruling Regarding Proof of Causation being filed October 27, 2006, which is

a motion relating to the offers of proof at trial, and to allow her until November 10, 2006 to file any other motions in limine. Consideration of these motions will assist both the parties and the Court in narrowing the issues for trial and may assist the parties in efforts to reach a resolution to this matter.

DATED this 30th day of October, 2006.

ASHBURN & MASON, P.C.
Attorneys for Plaintiff

/s/ Donna J. McCready
1227 West Ninth Avenue, Suite 200
Anchorage, Alaska 99501
Phone: (907) 276-4331
Fax: (907) 277-8235
E-mail: djm@anchorlaw.com
Alaska Bar No. 9101003

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October, 2006, a copy of the foregoing Motion to Extend Time to File Motions in Limine was served electronically on:

Gary Guarino

/s/ Donna J. McCready

P:\Clients\10194\Pleadings\Motion to Extend-In Limine 061027.doc

ASHBURN & MASON P.C.
LAWYERS
1227 WEST 9TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL 907.276.4331 • FAX 907.277.8235